

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

Shawn Sharrock
Johnnie Sharrock

CLERK
U.S. DISTRICT COURT
DISTRICT OF NEW JERSEY
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2015 SEP 29 A 10:58

(In the space above enter the full name(s) of the plaintiff(s).)

- against -

Daughters of Miriam

COMPLAINT

Jury Trial: ☐ Yes ☒ No

(check one)

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

I. Parties in this complaint:

- A. List your name, address and telephone number. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff

Name

Street Address

County, City

State & Zip Code

Telephone Number

Shawn Sharrock / Johnnie Sharrock
1360 Clifton Ave #260
Passaic, Clifton
NJ 07012
973 767 9053

- B. List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1

Name Daughters of Miriam
 Street Address 155 HAZEL ST
 County, City PASSAIC, Clifton
 State & Zip Code NJ 07012

Defendant No. 2

Name _____
 Street Address _____
 County, City _____
 State & Zip Code _____

Defendant No. 3

Name _____
 Street Address _____
 County, City _____
 State & Zip Code _____

Defendant No. 4

Name _____
 Street Address _____
 County, City _____
 State & Zip Code _____

II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. There are four types of cases that can be heard in federal court: 1) Federal Question - Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case; 2) Diversity of Citizenship - Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case; 3) U.S. Government Plaintiff; and 4) U.S. Government Defendant.

- A. What is the basis for federal court jurisdiction? (check all that apply)

<input type="checkbox"/> Federal Questions	<input type="checkbox"/> Diversity of Citizenship
<input type="checkbox"/> U.S. Government Plaintiff	<input checked="" type="checkbox"/> U.S. Government Defendant

- B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue? _____
- _____
- _____

C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship _____

Defendant(s) state(s) of citizenship _____

III. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur? At a long term care facility

B. What date and approximate time did the events giving rise to your claim(s) occur? This occurred on 6/9/2014

C. Facts: Father was in facility since 2,011 no therapy was given was told he did not have mental capability. Upon this choice wound started small & grew to a size that should not be. Every day they would be short staff so they left him sitting all day without movement and neck deep in feces when he was in bed. All 30-35 patients in dayroom

Negligence was Problem as proof of audiotape have from Head nurse by the name of Devan stating its a norm for patients to be in feces neck deep.
All around team effort

Supervisors dealt with my complaints and made adjustments

What happened to you?

Who did what?

Was anyone else involved?

Who else saw what happened?

IV. Injuries:

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received.

My dad Johnnie Shavock has been in and out of those wounds till now for infection caused by those people at the facility. The wound is now presently stage 4 to the bone piece of bone was cut, dissection has taken a toll on my dad's life.

V. Relief:

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation.

New Jersey seeking \$250,000 for pain and suffering to him and more.